

VDH Interim Guidance for Implementing Safe Practices for Critical Infrastructure Workers (Non-Healthcare) During Widespread Community Transmission in Virginia: Seafood Processing Focus

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Background:

Seafood processing facilities are a component of the [critical infrastructure within the Food and Agriculture sector](#). While functioning critical infrastructure is imperative during the response to the COVID-19 emergency and [guidance has been designed to ensure that work in critical infrastructure sectors can continue](#), critical infrastructure employers have an obligation to manage the continuation of work in a way that best protects the health of their workers and the general public. Employers are encouraged to create and maintain an updated COVID-19 response plan in accordance with the [CDC's COVID-19 Critical Infrastructure Sector Response Planning guidance](#). All seafood processing facilities developing plans for continuing operations in the setting of COVID-19 occurring among workers or in the surrounding community should:

- identify a qualified workplace coordinator who will be responsible for COVID-19 assessment and control planning;
- work directly with appropriate state and local public health officials and occupational safety and health professionals;
- incorporate relevant aspects of VDH and CDC guidance, including but not limited to the [CDC's Critical Infrastructure Guidance](#); and
- incorporate guidance from other authoritative sources or regulatory bodies as needed.

While guidance specific to critical infrastructure workers and employers has been developed, employers should also continue to review the [CDC's Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 \(COVID-19\)](#), as these recommendations are also applicable to protecting the critical infrastructure workforce and the surrounding communities. Employers are also encouraged to work with state and local officials to coordinate on activities like worker communication, infection control and case investigation.

Employee Education

- Supplement normal and required job training (e.g., training required under OSHA standards) with additional [information on COVID 19](#) including:
 - [Signs and symptoms of COVID-19](#) (e.g., cough, shortness of breath or difficulty breathing, fever, chills, muscle pain, sore throat, new loss of taste or smell)
 - [Ways to protect yourself from COVID-19](#)
 - [What to do if you are ill with COVID-19](#) (e.g., report illness to your supervisor; do not come to work)
 - [Hand hygiene](#)
 - Proper handwashing (e.g., wash hands with soap and water for at least 20 seconds and use disposable towels or hand dryer)
 - Proper use of hand sanitizers containing at least 60% alcohol
 - Avoiding touching of face, eyes, nose, and mouth (particularly until hand hygiene has been performed and personal protective equipment (PPE) has been removed)
 - [Respiratory etiquette](#)
 - Cover the mouth with a tissue when coughing or sneezing and then throw the tissue away or sneeze or cough into the elbow. Follow up with proper handwashing.

Employee Education (continued)

- [Physical distancing](#)
 - Maintain at least 6 feet (2 meters) between all people
- Appropriate use of Personal Protective Equipment (PPE)
 - CDC recommends that everyone wear a mask or [cloth face covering](#) if they are unable to practice [physical distancing](#)
- All communication and training should be easy to understand and should:
 - be verbal, if necessary,
 - be provided in languages appropriate to the preferred languages spoken or read by the employees, if possible, and
 - be at the appropriate literacy level.
- Employers should place posters in all of the languages that are common to their employees that encourage [staying home when sick](#), [cough and sneeze etiquette](#), and [proper hand hygiene practices](#). They should place these posters at the entrance to the workplace and in break areas, locker rooms, and other workplace areas where they are likely to be seen.
 - Additional resources can be found in the [VDH Business Toolkit](#).
- Establish a system for employees to alert management if they are experiencing signs or symptoms of COVID-19 or if they have had recent close contact with a suspected or confirmed COVID-19 case.

Physical Distancing

- Stagger arrival and departure times for employees to avoid groups of employees in parking areas, locker rooms, and near time clocks.
- [Provide visual cues](#) (e.g., [floor markings](#), [signs](#)) as a reminder to employees to maintain [physical distancing](#).
- Add additional clock in/out stations, if possible, that are spaced apart, to reduce crowding in these areas. Mark out 6-foot distances (or circles) for workers to stand in while they wait to punch in. Consider alternatives such as touch-free methods, staggering times for workers to clock in/out, or time-tracking other than using a common time-clock.
- Encourage single-file movement with a six-foot (2 meter) distance between each employee throughout the facility, where possible.
- Designate employees to monitor and facilitate distancing on processing floor lines.
- Modify the alignment of workstations, including along processing lines, if feasible, so that employees are at least six feet (2 meters) apart in all directions (e.g., side-to-side and when facing one another), when possible. Ideally, modify the alignment of workstations so that employees do not face one another. Consider using [markings](#) and [signs](#) to remind employees to maintain their location at their station away from each other and practice [physical distancing](#) on breaks.
- Use physical barriers, such as strip curtains, plexiglass or similar materials, or other impermeable dividers or partitions, to separate processing employees from each other, if feasible.
 - Clean and disinfect these surfaces regularly using guidance provided below.
- Stagger break times or provide temporary break areas and restrooms to avoid groups of employees during breaks. Employees should maintain at least six feet (2 meters) of distance from others at all times, including on breaks.
- Remove or rearrange chairs and tables (or add partitions to tables) in break rooms and other areas employees may frequent to increase worker separation. Identify alternative areas to accommodate overflow volume such as training and conference rooms, or using outside tents for break and lunch areas.

Physical Distancing (continued)

- Employers may determine that modifying processing or production lines, shifts, and staggering employees across shifts would help to maintain overall seafood processing capacity. For example, a plant that normally operates on one daytime shift may be able to split employees into two or three shifts throughout a 24-hour period. In some seafood processing plants, one shift may need to be reserved for cleaning and sanitization.
- Consider grouping together employees while practicing [physical distancing](#) as much as possible. This can increase the effectiveness of altering the plant's normal shift schedules by making sure that groups of employees are always assigned to the same shifts with the same coworkers. Grouping employees may reduce the spread of workplace COVID-19 transmission by minimizing the number of different individuals who come into close contact with each other over the course of a week. Grouping employees may also reduce the number of employees quarantined because of exposure to the virus.

Physical Distancing During Transportation To and From Work for Employees

- Encourage employees to avoid carpooling to and from work, if possible, unless they are from the same household.
- If carpooling or using company shuttle vehicles, the following control practices should be used:
 - limit the number of people per vehicle as much as possible (this may mean using more vehicles),
 - provide [face coverings](#) for both the driver and the passengers,
 - space out passengers as much as possible, and
 - provide ventilation in the vehicle by rolling down windows.
- Encourage employees to maintain [physical distancing](#) as much as possible.
- Encourage employees to wash their hands before entering the vehicle and when arriving at the destination.
- Encourage employees in a shared van or car space to wear [cloth face coverings](#).
- Clean and disinfect commonly touched surfaces after each carpool or shuttle trip (e.g., door handles, handrails, seat belt buckles) with an [EPA-approved disinfectant](#).
- Encourage employees to follow coughing and sneezing etiquette when in the vehicle.

Use of Personal Protective Equipment

- Employers who determine that [cloth face coverings](#) should be worn in the workplace, including to comply with state or local requirements for their use, should ensure the cloth face coverings:
 - fit over the nose and mouth and fit snugly but comfortably against the sides of the face;
 - are secured with ties or ear loops;
 - include multiple layers of fabric and allow for breathing without restriction;
 - can be laundered using the warmest appropriate water setting and machine dried daily after the shift, without damage or change to shape (a clean cloth face covering should be used each day);
 - are not used if they become wet or contaminated;
 - are replaced with clean replacement when the covering becomes wet, soiled, or otherwise visibly contaminated during the work shift;
 - are handled as little as possible to prevent transferring infectious materials to the cloth; and
 - are not worn with or instead of respiratory protection when respirators are needed.
- CDC also has [additional information on the use of face coverings](#), including washing instructions and information on how to make homemade face covers.

Inside the Processing Plant Controls, Sanitation Practices and COVID-19

- Seafood processors should maintain compliance with all required Good Manufacturing Practices (GMPs) and Sanitation Schedules and perform additional frequencies to cleaning schedules to maintain routine cleaning and disinfecting of surfaces, equipment, and other high touch areas (doorknobs, tables, countertops, bathrooms, and stair railings).
- Ensure employees have access to supplies such as soap, alcohol-based hand sanitizer with at least 60% alcohol, tissues, and lined trash cans. Keep these items in common areas, restrooms, and areas where employees eat.
 - Consider installing touchless faucets, soap dispensers and paper towel dispensers and provide single-use paper towels at all handwashing stations, if possible. Air hand dryers may disperse virus particles in the air.
 - If possible, choose hand sanitizer stations that are touch-free.
 - See OSHA's Sanitation Standard ([29 CFR 1910.141](#)), which requires employers to provide handwashing facilities for workers.
- Use [EPA-registered disinfectant](#) or household bleach solutions to clean and disinfect frequently touched objects and surfaces. There is a [list](#) of EPA-registered "disinfectant" products for COVID-19 that have qualified under EPA's emerging viral pathogen program. Check the product label guidelines for if and where these disinfectant products are safe and recommended for use in food manufacturing areas or food establishments.
- Disinfect transportation vehicles prior to and after use by employees.
- Facilities should consider consulting with a heating, ventilation, and air conditioning engineer or their facility's environmental services manager to ensure adequate ventilation in work areas to help minimize employees' potential exposures.
- If fans such as pedestal fans or hard mounted fans are used in the facility, take steps to minimize air from fans blowing from one worker directly at another worker. Ceiling fans with upward airflow rotation are preferred. Personal cooling fans should be removed from the workplace to reduce the potential spread of any airborne or aerosolized viruses. If fans are removed, employers should remain aware of, and take steps to prevent, [heat hazards](#).
- Create separate shift entry and exit points to avoid unnecessary comingling of staff.
- Remove unnecessary doors, turnstiles, or other physical barriers to increase circulation and decrease high touch areas.
- Noise levels in production areas might require the use of hearing protection. Consider devising a method of non-verbal communication using sign language or pictograms for the most common communications to facilitate worker communication while maintaining [physical distance](#).

Administrative Controls

- Hold in-person meetings only when needed. Limit the number of people in attendance and maintain 6-foot [physical distancing](#) between participants as much as possible.
- [Screening employees for COVID-19 symptoms](#) (such as temperature checks) is an optional strategy that employers may use. If implemented for all employees, policies and procedures for screening employees should be developed in consultation with state and local health officials and occupational medicine professionals. Options to screen employees for COVID-19 symptoms include:
 - Screen prior to entry into the facility;

Administrative Controls (continued)

- Provide verbal screening in appropriate language(s) to determine whether employees are ill.
 - Questions to consider for verbal screening of employees include:
 - ***“YES or NO, since your last time at work have you had any of the following?”***
 - A new fever (100.4 F or higher), or a sense of having a fever?
 - A new cough that you cannot attribute to another health condition?
 - New shortness of breath that you cannot attribute to another health condition?
 - New chills that you cannot attribute to another health condition?
 - A new sore throat that you cannot attribute to another health condition?
 - New muscle aches that you cannot attribute to another health condition, or that may have been caused by a specific activity (such as physical exercise)?
 - A new loss of taste or smell?
 - ***“YES or NO, in the last 4 hours have you:***
 - Taken any fever reducing medication?
- Check temperatures of workers at the start of each shift to identify anyone with a fever of 100.4°F or greater (or reported feelings of feverishness). Ensure that:
 - screeners are trained to use temperature monitors,
 - screeners wear appropriate PPE, and
 - monitors are accurate under conditions of use (such as cold temperatures).
- Do not let employees enter the workplace if they have a fever of 100.4°F or greater (or reported feelings of feverishness) or if screening results indicate that the worker is suspected of having COVID-19.
 - Provide the symptomatic employee with a facemask or cloth face covering if they do not already have one;
 - Encourage the employee to self-isolate and contact a healthcare provider;
 - [Provide information on the facility's return-to-work policies](#) and procedures; and
 - Inform human resources, the employee health unit (if in place), and the supervisor (so employee can be moved off schedule during illness and a replacement can be assigned, if needed).
- Monitor and respond to absenteeism at the workplace. Implement plans to continue essential business functions in cases of higher than usual absenteeism.
- Review leave policies. Consider implementing liberal leave policies for sick employees. Make sure that employees are aware of and understand these policies.
 - Additional flexibilities might include giving advances on future sick leave and allowing employees to donate sick leave to each other.
- Analyze any incentive programs and consider modifying them, if warranted, so that employees are not penalized for taking sick leave if they have COVID-19.
- Assess workforce and staffing needs with self-quarantine in mind to see how exposed workers might be able to stay home or work in a way that allows for [physical distancing](#) for 14 days after exposure.
- Support workers who meet the definition of close contact with a household member to quarantine at home as opposed to continuing to work if asymptomatic. For instance, help with income, food and social needs to support up to 2 weeks of quarantine.

Administrative Controls (continued)

- Encourage workers to share their place of work with the health department to facilitate contact tracing and let them know that doing this will not result in punitive action. Further, employees should be encouraged to share the specific plant name and section(s) of the plant they work in so that contact tracing can be effective.
- Encourage workers to allow the health department to share their name with their employer to make contact tracing easier.
- Establish a system for employees to alert their supervisors if they are experiencing signs or symptoms of COVID-19 or if they have had recent close contact with a suspected or confirmed COVID-19 case.
 - In addition to general illness reporting procedures, have a plan as to where an employee who becomes sick while at work can be isolated until they can be safely transported to their home or other location where they will continue to isolate until illness resolves.
- Prepare employees for changes in operations that may need to occur due to COVID-19. Examples include:
 - Cross-training workers to perform essential functions to maintain operations;
 - Assessing essential functions and how operations will be carried out with a reduced workforce;
 - Developing a communications plan to share information daily to reinforce educational messages, provide updated information about the number of confirmed cases at the plant, and to share updates about steps being taken to keep the workers safe, including testing and contact tracing;
 - Educating workers about reporting illness to their supervisors and the importance of not coming to work while ill;
 - Working with health department officials to distribute information about COVID-19, how it is transmitted and the importance of [physical distancing](#), handwashing and other measures to prevent illness. Consider using media resources available to the plant, such as closed circuit TV in breakrooms and posted written materials in locker rooms or other common areas to emphasize the importance of this information.

Employee Self-Monitoring

VDH recommends that ALL critical infrastructure/essential personnel, regardless of known exposure, [self-monitor for symptoms](#) under the supervision of their employer's occupational health program, if available. Key points related to self-monitoring include:

- In Virginia, there is currently increased community transmission occurring throughout the state. The recommendation for essential personnel to self-monitor their health should be implemented until the risk of COVID-19 in Virginia communities decreases.
- A [VDH monitoring log](#) is available (optional) to assist with self-monitoring.
- All businesses/employers should request that their staff self-monitor for illness even in the absence of a formal, onsite occupational health program.
- Employers should consult with their local health department regarding COVID-19 activity in the community and/or any planned changes in employee monitoring.

Cleaning and Disinfection

Increased [cleaning and disinfection](#) are important to decrease the amount of virus in the environment. Refer to [List N on the EPA website for EPA-registered disinfectants](#) that have qualified under EPA's emerging viral pathogens program for use against COVID-19.

Cleaning and Disinfection (continued)

- Increase staffing for cleaning and disinfection, and increase the frequency of these activities.
- Clean and disinfect all areas such as offices, bathrooms, common areas and shared electronic equipment routinely.
- Conduct targeted, more frequent cleaning of high-touch areas and shared spaces (e.g., time clocks, bathroom fixtures, stair railings, break room tables and chairs, locker rooms, vending machines, railings, door handles, and computers).
- Disinfect tools used by multiple workers between uses.
- If a worker becomes ill at work, pay special attention to cleaning and disinfecting the areas where that person was working. Follow the CDC guidance on [cleaning and disinfecting your building or facility if someone is sick](#).
- Check that you are following label directions and observing contact times.
- Ensure the facility is adequately ventilated. Use air filters in systems where this is feasible. Ensure that ventilation systems blow clean air in the worker's breathing zone.

If an Employee Has Tested Positive For COVID-19 or Has Symptoms of COVID-19:

- Sick employees should follow CDC's [What to do if you are sick with COVID-19](#) and VDH guidance for returning to work (found in the "monitoring" section of [VDH Interim Guidance on Screening, Monitoring, and Testing Employees](#)).
- As soon as an employee develops symptoms of COVID-19, provide the individual with a cloth face covering and isolate him or her from others.
- If the employee is at greater risk of developing severe illness (e.g., aged 65 years or older or with an underlying condition such as chronic lung disease, chronic heart disease, diabetes, cancer, or weakened immune system) or the employee's symptoms get worse, call a healthcare provider.
- If the employee lives in a congregate or shared living space with other employees, ideally provide the employee with a private room with a door to use as an isolation area. If this is not feasible and there is more than one ill worker, then ill workers may be grouped together, but separated from non-ill workers.
 - Limit movement outside of the isolation area;
 - Assign a dedicated bathroom, ideally attached to the sleeping area;
 - Exclude from activities and provide meals within the isolation area;
 - Use a large, well-ventilated room to house ill persons, if possible;
 - Keep beds at least 6 feet apart;
 - Use temporary barriers between beds (such as curtains);
 - Request that ill persons sleep head-to-toe;
 - If leaving the isolation area is required, the employee should wear a cloth face covering; and
 - If the employee requires medical attention, notify the healthcare facility prior to arrival.
- Follow CDC recommendations for cleaning and disinfection the [home](#) or [facility](#).

If an Employee Has Been a Close Contact of a Known COVID-19 Case (Positive Test):

- Instruct employees who are well, but have been exposed to COVID-19, to notify their supervisor and follow CDC's [Interim Guidance for Implementing Safety Practices for Critical Infrastructure Workers Who May Have Had Exposure to a Person with Suspected or Confirmed COVID-19](#).
- If possible, a potentially exposed employee should self-quarantine for 14 days since the last potential exposure.

If an Employee Has Been a Close Contact of a Known COVID-19 Case (Positive Test): (continued)

- Self-quarantine means staying home and avoiding contact with others. Workers who are self-quarantining should not go to work or school or take public transportation (taxis, buses or ride-shares), if possible. The [local health department](#) can assist with making sure that a person's basic needs (for example, food and medication) are met.
- For more information on self-quarantine, see [VDH: What to do if you were potentially exposed to coronavirus disease \(COVID-19\)](#).
- Exposed employees should follow VDH guidance for returning to work (found in the "monitoring" section of [VDH Interim Guidance on Screening, Monitoring, and Testing Employees](#)).
- If self-quarantine is not possible, because of the negative impact this would have on maintaining critical business operations, the worker may continue to work as long as additional safety precautions, as described in [CDC guidance](#), are implemented (including wearing a face mask/cloth face covering) **and** the worker remains *asymptomatic*.
 - Reintegrating exposed, asymptomatic workers to onsite operations, while discussed in the critical infrastructure guidance, should not be misinterpreted as always being the first or most appropriate option to pursue in managing critical work tasks. Home quarantine is the preferred option for exposed workers.
 - Additional safety precautions include measuring the employee's temperature and assessing for symptoms of COVID-19 before each work shift ("pre-screening"), asking the employee to self-monitor for symptoms during their work shift, and wearing a cloth face covering.
 - If resources are not available to measure worker's temperatures, employers may rely on verbal screening questionnaires.
 - If symptoms develop, the worker must stop working immediately and [self-isolate](#).
 - Employers are encouraged to have a plan for where workers who become ill while at work can be isolated at the workplace while waiting to be transported to either their home, alternate isolation facility (if the home environment can not facilitate appropriate isolation from others), or to a healthcare facility.
- If the employee lives in a congregate or shared living space with other employees and a private room is not available, ensure the following:
 - [Physical distancing](#) is observed by maintaining 6 feet or 2 meters separation within the home;
 - Cleaning and disinfection of all areas (sleeping areas, common living areas, bathrooms, etc.) is performed routinely;
 - If individual quarantine cannot occur, grouping of exposed employees may be necessary;
 - Employees who are not ill are not grouped with employees who are ill.

Other Resources of Interest

The Occupational Safety and Health Administration (OSHA) also issued [Guidance on Preparing Workplaces for COVID-19](#) that includes information on how a COVID-19 outbreak could affect workplaces and steps all employers can take to reduce workers' risk of exposure to COVID-19.